

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

L.C. ELDRIDGE SALES CO., LTD.,  
LESEMAN DAVIS LLC,

Plaintiffs,

v.

AZEN MANUFACTURING PTE., LTD.,  
JURONG SHIPYARD PTE, LTD.,  
SEMBCORP MARINE LTD.,  
TWIN CITY FAN COMPANIES, LTD.,  
ZHENGZHOU FG OFFSHORE  
ENGINEERING & EQUIP. CO., LTD.,  
ATWOOD DRILLING, INC.,  
ATWOOD OCEANICS MANAGEMENT, LP,  
FG ENGINEERING, LTD.,  
FRIEDE & GOLDMAN, L.L.C.,  
SEADRILL AMERICAS, INC.,  
SEMBCORP HOLDINGS, LLC,  
SEMBCORP-SABINE INDUSTRIES, INC.,  
SEMBCORP-SABINE SHIPYARD, INC.

Defendants.

Civil Action No. 6:11-cv-599

**ADDITIONAL DOCUMENTS TO AZEN DEFENDANTS' MOTION FOR LEAVE TO  
AMEND INVALIDITY CONTENTIONS [#142]**

ADDITIONAL DOCUMENTS TO DKT #142:

1. Declaration of Joseph J. Beaman, Jr.;
2. Declaration of Carrie Ryan Gallia
  - a. Ex. A – Lewis
  - b. Ex. B – Edwards
  - c. Ex. C – Beaman Report

d. Ex. D – Davis Rebuttal

e. Ex. E – Chart

DATED: April 19, 2013

**GILLAM & SMITH, L.L.P.**

By/s/ Melissa R. Smith

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been electronically served upon all known counsel of record on this 19<sup>th</sup> day of April 2013 *via* the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

**CERTIFICATE OF CONFERENCE**

On Thursday, April 18, 2013, Eric Chenoweth, counsel for Plaintiffs, and Chris Sullivan, counsel for Defendants, participated in a meet and confer in compliance with Local Rule CV-7(h) and discussed the relief requested in this Motion. No agreement on this Motion could be reached and the discussions have conclusively ended in an impasse, leaving an open issue for the Court to resolve.

/s/ Melissa R. Smith